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BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

2003 DEC -4 PM 3:19

December 4, 2003

T.R.A. DOCKET ROOM

*IN RE: Implementation of the Federal* ) *Docket No. 03-00491*  
*Communications Commission's Triennial* )  
*Review Order (Nine-month Proceeding)* )  
*(Switching)* )

**IDS TELCOM, LLC'S RESPONSES TO BELL SOUTH'S  
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

IDS TELCOM, LLC'S ("IDS") hereby responds to BellSouth Telecommunications, Inc. ("BellSouth"), discovery requests.

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

**Response:** Please see objections to this request filed November 6, 2003.

2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Tennessee.

**Response:** Please see objections to this request filed November 6, 2003.

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide non-qualifying service.

**Response:** Please see objections to this request filed November 6, 2003

4. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

**Response:** Please see objections to this request filed November 6, 2003

5. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

**Response:** Respondent does not have documents responsive to this request.

6. Provide all documents referring or relating to the classifications used by IDS to offer service to end user customers Tennessee (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

**Response:** Respondent does not have documents responsive to this request.

7. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by IDS, as requested in BellSouth's First Set of Interrogatories, No. 34

**Response:** Respondent does not have documents responsive to this request.

8. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by IDS, as requested in BellSouth's First Set of Interrogatories, No. 35.

**Response:** Please see objections to this request filed November 6, 2003.

9. Produce all documents referring or relating to how IDS determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

**Response:** Please see objections to this request filed November 6, 2003.

10. Produce all documents referring or relating to the typical or average number of DS0s at which IDS would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

**Response:** Please see objections to this request filed November 6, 2003.

11. Produce all documents referring or relating to the cost of capital used by IDS in evaluating whether to offer a qualifying service in a particular geographic market.

**Response:** Respondent has not documents responsive to this request.

12. Produce all documents referring or relating to the time period used by IDS in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

**Response:** Respondent has no documents responsive to this request.

13. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

**Response:** Respondent has no documents responsive to this request.

14. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

**Response:** Respondent has no documents responsive to this request.

15. Produce all documents referring or relating to any complaints by IDS or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

**Response:** Respondent has had no hot cuts performed in Tennessee. As such, there are no documents responsive to this request.

16. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to IDS or that IDS believes is superior to BellSouth's batch hot cut process.

**Response:** Respondent has had not batch hot cuts performed in Tennessee. As such there are no documents responsive to this request.

17. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to IDS or that IDS believes is superior to BellSouth's individual hot cut process.

**Response:** Respondent has no documents responsive to this request.

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to IDS or that IDS believes is superior to BellSouth's batch hot cut process.

**Response:** Respondent has no documents responsive to this request.

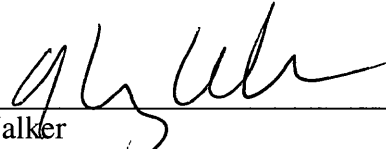
19. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to IDS or that IDS believes is superior to BellSouth's individual hot cut process.

**Response:** Respondent has no documents responsive to this request.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: \_\_\_\_\_

  
Henry Walker  
414 Union Street, Suite 1600  
P.O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363

Authorized representative for Respondent.

## CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

Guy Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201

Charles B. Welch, Esquire  
Farris, Mathews, et. Al  
618 Church St., #300  
Nashville, TN 37219

Timothy Phillips, Esquire  
Office of Tennessee Attorney General  
P. O. Box 20207  
Nashville, Tennessee 37202

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave., N. #320  
Nashville, TN 37219-1823

James Wright, Esquire  
United Telephone – Southeast  
14111 Capital Blvd.  
Wake Forest, NC 27587

Martha M. Ross-Bain, Esq.  
AT&T Communications of the  
South Central States, LLC  
1200 Peachtree Street, Suite 8100  
Atlanta, GA 30309

Ms. Carol Kuhnow  
Qwest Communications, Inc.  
4250 N. Fairfax Dr.  
Arlington, VA 33303

Jon E. Hastings, Esq.  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

Dale Grimes, Esq.  
Bass, Berry & Sims  
315 Deaderick St., #2700  
Nashville, TN 37238-3001

Mark W. Smith, Esq.  
Strang, Fletcher, et al.  
One Union Square, #400  
Chattanooga, TN 37402

Nanette S. Edwards, Esq.  
ITC^DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802

Henry Walker

